

REMARKS

Applicant requests reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1-12 are pending in the present application. Claims 1, 5, and 9 are the independent claims.

Claims 1, 5, and 9 have been amended. No new matter has been added.

The Office Action objected to the Specification for the alleged inclusion of new matter. Specifically, it was alleged that the recitation of “mechanical load” constitutes new matter. While not conceding the propriety of this objection, Applicant has amended the Specification to remove reference to the alleged new matter.

Favorable consideration is respectfully requested.

Claims 1-12 stand rejected under the first paragraph of 35 U.S.C. § 112 for the inclusion of alleged new matter. Specifically, it was alleged that the recitation of “mechanical load” constitutes new matter. While not conceding the propriety of this rejection, Applicant has amended independent claims 1, 5, and 9 to remove reference to the alleged new matter and respectfully submits that claims 1-12 now even more fully satisfy the requirements of 35 U.S.C. § 112, first paragraph.

Accordingly, favorable reconsideration and withdrawal of the rejection of claims 1-12 under the first paragraph of 35 U.S.C. § 112 are respectfully requested.

Claims 1-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,453,934 (Taghavi et al.) in view of the article entitled “A Review of ANN-based short- term load Forecasting” (Rui et al.), and in further view of U.S. Patent No. 6,430,455 (Rebellow et al.). All rejections are respectfully traversed.

It is respectfully submitted that independent claims 1, 5, and 9 have been amended to patentably define over the asserted citations.

Taghavi et al. relates to a method for use in designing an arbitrarily shaped object and discusses a method of design and testing using a CAD system in which a computational grid (a decomposed object of study) is automatically produced (Taghavi et al., FIG. 2). However, as the Office Action acknowledges, Rui et al. does not teach or suggest load forecasting. (Office Action, page 3). Nonetheless, the Office Action contends that Rui et al. is at least reasonably

pertinent to the field of endeavor of the inventive subject matter of the present application. (Office Action, page 7). This latter contention is respectfully traversed.

Rui et al. relates to artificial neural network-based load forecasting models for power systems, which models improve over conventional load forecasting models which showed inaccurate results depending on the presence of changes in environment and required long computational time. Applicant respectfully submits that one of ordinary skill in the art would not logically look to such art to forecasting models for power systems to solve problems associated with master model creation for computer-aided drafting.

Thus, a rejection under 35 U.S.C. § 103 based on Rui et al. is improper. See Manual of Patent Examining Procedure, Section 2241.01(a).

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claims 1, 5, and 9 under 35 U.S.C. § 103 are respectfully requested.

Independent claims 1, 5, and 9 recite, inter alia, ... generating an analytic model where a load region data ... is added to the master model....

However, Applicant respectfully submits that none of Taghavi et al., Rui et al. or Rebello et al. teaches or suggests at least the aforementioned features. Thus, without conceding the propriety of the asserted combination, **it is submitted that the asserted combination is likewise deficient because there is no teaching or suggestion of at least the aforementioned features when the asserted combination of citations is made.**

The Office Action concedes that a combination of Taghavi et al. and Rui et al. does not teach or suggest at least the aforementioned feature of independent claims 1, 5, and 9. Nonetheless, the Office Action rejects these claims contending that Rebello et al. provides the necessary teaching or suggestion. (Office Action, pages 4, 5, and 7). This contention is respectfully traversed.

Rebello et al. relates to managing how current files of a product are at the time of release and discusses using programs stored in a CAD/CAM system 12 to generate a master model 20 from a plurality of model features stored in a database 22. (Rebello et al., Col. 2, lines 45-48; FIG. 1). Rebello et al. goes on to discuss using a data population and extraction program to extract attributes from model features used to make the master model and to populate a data file (e.g., a drawing 24) with the extracted attributes. (Rebello et al., Col. 2, lines 48-52; FIG. 1). In operation, first, attribute data is extracted to files from the model features used in the master

models, and then the extracted data is compared with preliminarily stored attribute data in a version control system. Next, if differences exist, the extracted attribute data is stored in the version control system as the current version. However, absent from Rebello et al. is any teaching or suggestion of adding of any data to a master model.

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claims 1, 5, and 9 under 35 U.S.C. § 103 are respectfully requested.

Independent claims 1, 5, and 9 patentably define the present invention for at least another reason. Independent claims 1, 5, and 9 also recite, inter alia, creating load region data for specifying a load applying region in a master model, the load applying region being a portion of the master model to which a load will be applied, the load being at least one of an external force and a temperature.

However, Applicant respectfully submits that none of Taghavi et al., Rui et al. or Rebello et al. teaches or suggests at least the aforementioned features. Thus, without conceding the propriety of the asserted combination, **it is submitted that the asserted combination is likewise deficient because there is no teaching or suggestion of at least the aforementioned features when the asserted combination of citations is made.**

Taghavi et al. relates to a method for use in designing an arbitrarily shaped object and discusses a method of design and testing using a CAD system in which a computational grid (a decomposed object of study) is automatically produced (Taghavi et al., FIG. 2).

Rui et al. relates to load forecasting and surveys ANN-based short-term load forecasting (STLF) models for power systems.

Rebello et al. relates to managing how current files of a product are at the time of release and discusses using programs stored in a CAD/CAM system 12 to generate a master model 20 from a plurality of model features stored in a database 22.

However, all of these asserted citations are silent as to and thus do not teach or suggest, for example, specifying a load applying region in a master model.

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claims 1, 5, and 9 under 35 U.S.C. § 103 are respectfully requested.

Lastly, in the Response to Arguments portion of the Office Action, it appears that Applicant's patentability arguments presented in the last Amendment may have been

mischaracterized. Attention is respectfully directed to the seventh full paragraph on page 6 of the Amendment filed June 23, 2005. In that paragraph, it was asserted that the asserted combination of citations was deficient, not merely that each of the asserted citations was deficient. Indeed, the technical discussion following the seventh paragraph was in support of Applicant's position, explaining how each citation failed to provide a necessary teaching or suggestion resulting in a combination which also lacked the necessary teaching or suggestion.

In view of the foregoing, Applicant respectfully submits that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. Separate and individual consideration of the dependent claims is respectfully requested.

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action. However, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to such matters.

There being no further outstanding objections or rejections, it is submitted that the present application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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